

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

THE DEPARTMENT OF THE TREASURY
OF THE STATE OF NEW JERSEY AND ITS
DIVISION OF INVESTMENT, on behalf of
itself and all others similarly situated,

Plaintiff,

v.

CLIFFS NATURAL RESOURCES INC.,
JOSEPH CARRABBA, LAURIE BRLAS,
TERRY PARADIE, and DAVID B. BLAKE

Defendants.

Civ. A. No. 14-CV-1031-DAP

Judge Dan Aaron Polster

Magistrate Judge Greg White

**STIPULATION REGARDING ANSWER TO THE
SECOND AMENDED COMPLAINT**

Lead Plaintiff, the Department of the Treasury of the State of New Jersey and its Division of Investment, and defendants Cliffs Natural Resources Inc., Joseph Carrabba, Laurie Brlas, Terry Paradie, and David B. Blake (“Defendants”), hereby stipulate and agree that Defendants shall have until December 21, 2015, to file their answer to the Second Amended Complaint (Doc. No. 55).

DATED: November 19, 2015

/s/ Scott D. Simpkins
John R. Climaco (0011456)
Scott D. Simpkins (0066775)
CLIMACO WILCOX PECA TARANTINO
& GAROFOLI CO., LPA
55 Public Square, Suite 1950
Cleveland, OH 44113
Telephone: (216) 621-8484
Facsimile: (216) 771-1632
jrclim@climacolaw.com
sdsimp@climacolaw.com

*Local Counsel for Lead Plaintiff, the
Department of the Treasury of the State of
New Jersey and its Division of Investment*

Michael B. Himmel (*admitted pro hac vice*)
Michael T.G. Long (*admitted pro hac vice*)
Jamie Gottlieb Furia (*admitted pro hac vice*)
Joseph A. Fischetti (*admitted pro hac vice*)
LOWENSTEIN SANDLER LLP
65 Livingston Avenue
Roseland, New Jersey 07068
Telephone: (973) 597-2500
Facsimile: (973) 597-2400
mhimmel@lowenstein.com
mlong@lowenstein.com

Gerald H. Silk (*admitted pro hac vice*)
James A. Harrod (*admitted pro hac vice*)
Rebecca E. Boon (*admitted pro hac vice*)
BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP
1285 Avenue of the Americas
New York, New York 10019
Telephone: (212) 554 1400
Facsimile: (212) 554 1444
jerry@blbglaw.com
jim.harrod@blbglaw.com
rebecca.boon@blbglaw.com

Co-Counsel for Lead Plaintiff, the Department of the Treasury of the State of New Jersey and its Division of Investment, and Lead Counsel for the Putative Class

/s/ John M. Newman, Jr.
John M. Newman, Jr. (0005763)
Geoffrey J. Ritts (0062603)
Adrienne Ferraro Mueller (0076332)
JONES DAY
901 Lakeside Avenue
Cleveland, Ohio 44114-1190
Telephone: 216.586.3939
Facsimile: 216.579.0212
jmnewman@jonesday.com
gjritts@jonesday.com
afmueller@jonesday.com

Counsel for Defendants Cliffs Natural Resources Inc., Joseph Carrabba, Laurie Brlas, Terry Paradie, and David B. Blake

CERTIFICATE OF SERVICE

A copy of the foregoing Stipulation Regarding Answer to the Second Amended Complaint was filed electronically this 19th day of November, 2015. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ John M. Newman, Jr.
John M. Newman, Jr. (0005763)
JONES DAY
901 Lakeside Avenue
Cleveland, Ohio 44114-1190
Telephone: 216.586.3939
Facsimile: 216.579.0212
jmnewman@jonesday.com

*One of the Attorneys for Defendants
Cliffss Natural Resources Inc., Joseph
Carrabba, Laurie Brlas, Terry Paradie,
and David B. Blake*